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10	UNITED STATES	DISTRICT COURT		
11	NORTHERN DISTRICT OF CA	LIFORNIA, SAN JOSE DIVISION		
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13		Case No. 5:20-cv-3664-LHK-SVK		
14	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER	[PROPOSED] ORDER GRANTING		
15	CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of all similarly	MOTION TO SEAL		
16	situated,	Referral: Hon. Susan van Keulen, USMJ		
17	Plaintiffs,			
18	V.			
19	GOOGLE LLC,			
20	Defendant.			
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23		_		
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		1 Cosa No. 5:20 av 03664 LUV S		

[PROPOSED] ORDER GRANTING MOTION TO SEAL

Case 4:20-cv-03664-YGR Document 376-1 Filed 01/03/22 Page 1 of 9

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Seal Documents Pursuant to Dkt. 358 ("Motion"). Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

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Sealed GOGG-BRWN- 00409986 (Dkt. 9	6	Documents Sought to Be	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling	
O0409986 (Dkt. redacted portions at: Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details related to internal project, links, and goals, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, documents, and practices relating to competing products. GOOG-BRWN-00226088 (Dkt. 360-2)	/				
Pages 1-2 Pages 1-2 of Google's internal systems and operations, including details related to internal project, links, and goals, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google's internal projects, documents, and practices relating to competing products. GOOG-BRWN- 00226088 (Dkt. 360-2) GRANTED as to redacted portions at: Google's highly confidential and proprietary information requested to be sealed contains Google's highly confidential and proprietary information regarding encryption of Google's produced document, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's internal strategies, system designs, and business practices for operating and	8				
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confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and	25			•	
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	27			Google's internal strategies, system designs,	
	28				

1			falls within the protected scope of the		
$_{2}\Vert$			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential		
			and proprietary information may place Google		
3			at an increased risk of cyber security threats, as		
4			third parties may seek to use the information to		
_			compromise Google's internal documents		
5	COOC DDWN	CD ANTED	subject to the Protective Order in this case.		
6	GOOG-BRWN- 00225677 (Dkt.	GRANTED as to	The information requested to be sealed contains Google's highly confidential and proprietary		
_	360-4)	redacted portions at:	information regarding encryption of Google's		
7	200 1)	page 4	produced document, that Google maintains as		
8			confidential in the ordinary course of its		
			business and is not generally known to the		
9			public or Google's competitors. Such		
10			confidential and proprietary information reveals Google's internal strategies, system designs,		
$_{11}$			and business practices for operating and		
11			maintaining many of its important services, and		
12			falls within the protected scope of the		
13			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential		
			and proprietary information may place Google		
14			at an increased risk of cyber security threats, as		
15			third parties may seek to use the information to		
1.			compromise Google's internal documents		
16	GOOG-BRWN-	GRANTED as to	subject to the Protective Order in this case The information requested to be sealed contains		
17	00477510 (Dkt.	redacted portions at:	Google's highly confidential and proprietary		
18	360-5)	1	information regarding highly sensitive features		
		Redacted in its entirety	of Google's internal systems and operations,		
19			including details related to internal research and		
20			methodology, that Google maintains as confidential in the ordinary course of its		
			business and is not generally known to the		
21			public or Google's competitors. Such		
22			confidential and proprietary information reveals Google's internal strategies, system designs,		
23			and business practices for operating and		
			maintaining many of its important services, and		
24			falls within the protected scope of the		
25			Protective Order entered in this action. <i>See</i> Dkt.		
			81 at 2-3. Public disclosure of such confidential and proprietary information could affect		
26			Google's competitive standing as competitors		
27			may alter their systems and practices relating to		
28			competing products. It may also place Google		
20			at an increased risk of cyber security threats, as		

1			third parties may seek to use the information to compromise Google's internal projects and		
2			practices relating to competing products.		
3	GOOG-CABR-	GRANTED as to	The information requested to be sealed contains		
4	03750737 (Dkt. 360-9)	redacted portions at:	Google's highly confidential and proprietary information regarding highly sensitive features		
4	300))	Pages 8-10, 16, 17, 21	of Google's internal systems and operations,		
5			including details related to proprietary and		
6			potential features of its product, that Google		
_			maintains as confidential in the ordinary course of its business and is not generally known to the		
7			public or Google's competitors. Such		
8			confidential and proprietary information reveals		
9			Google's internal strategies, system designs, and business practices for operating and		
10			maintaining many of its important services, and		
10			falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt.		
11			81 at 2-3. Public disclosure of such confidential		
12			and proprietary information could affect		
13			Google's competitive standing as competitors		
13			may alter their systems and practices relating to competing products. It may also place Google		
14			at an increased risk of cyber security threats, as		
15			third parties may seek to use the information to		
16			compromise Google's features and practices relating to competing products.		
10	GOOG-BRWN-	GRANTED as to	The information requested to be sealed contains		
17	00140297 (Dkt.	redacted portions at:	Google's highly confidential and proprietary		
18	360-14)	Dogge 15 17 20 22 27	information regarding highly sensitive features		
19		Pages 15, 17, 20-23, 27, 29, 31-33	of Google's internal systems and operations, including details related to proprietary and		
20			potential features of its product, that Google maintains as confidential in the ordinary course		
21			of its business and is not generally known to the		
22			public or Google's competitors. Such confidential and proprietary information reveals		
23			Google's internal strategies, system designs, and business practices for operating and		
			maintaining many of its important services, and		
24			falls within the protected scope of the		
25			Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential		
26			and proprietary information could affect		
27			Google's competitive standing as competitors may alter their systems and practices relating to		
			competing products. It may also place Google		
28			at an increased risk of cyber security threats, as		
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1			third parties may seek to use the information to
$_{2}\Vert$			compromise Google's features and practices
	GOOG GAPP	CD ANTED	relating to competing products.
3	GOOG-CABR-	GRANTED as to	The information requested to be sealed contains
	04991831 (Dkt.	redacted portions at:	Google's highly confidential and proprietary
4	360-15)	page 1	information regarding highly sensitive features of Google's internal systems and operations,
5		page 1	including details related to internal projects and
			proprietary and potential features of its product,
6			that Google maintains as confidential in the
7			ordinary course of its business and is not
′			generally known to the public or Google's
8			competitors. Such confidential and proprietary
			information reveals Google's internal
9			strategies, system designs, and business
10			practices for operating and maintaining many of
			its important services, and falls within the protected scope of the Protective Order entered
11			in this action. See Dkt. 81 at 2-3. Public
12			disclosure of such confidential and proprietary
			information could affect Google's competitive
13			standing as competitors may alter their systems
14			and practices relating to competing products. It
			may also place Google at an increased risk of
15			cyber security threats, as third parties may seek to use the information to compromise Google's
16			internal projects, features, and practices relating
			to competing products.
17	GOOG-CABR-	GRANTED as to	The information requested to be sealed contains
18	05269357 (Dkt.	redacted portions at:	Google's highly confidential and proprietary
	360-16)		information regarding highly sensitive features
19		Redacted in its entirety	of Google's internal systems and operations,
20			including details related to internal projects and products and their proprietary features, that
			Google maintains as confidential in the
21			ordinary course of its business and is not
22			generally known to the public or Google's
			competitors. Such confidential and proprietary
23			information reveals Google's internal
24			strategies, system designs, and business practices for operating and maintaining many of
			its important services, and falls within the
25			protected scope of the Protective Order entered
26			in this action. See Dkt. 81 at 2-3. Public
			disclosure of such confidential and proprietary
27			information could affect Google's competitive
28			standing as competitors may alter their systems
			and practices relating to competing products. It

1			may also place Google at an increased risk of		
$_{2}\Vert$			cyber security threats, as third parties may seek		
			to use the information to compromise Google's internal projects, features and practices relating		
3			to competing products.		
$_{4}\parallel$	GOOG-BRWN-	GRANTED as to	The information requested to be sealed contains		
	00457784 (Dkt.	redacted portions at:	Google's highly confidential and proprietary		
5	360-17)		information regarding Google's internal		
6		page 1	systems and operations, including details		
_			related to internal projects and discussions, that Google maintains as confidential in the		
7			ordinary course of its business and is not		
8			generally known to the public or Google's		
9			competitors. Such confidential and proprietary		
9			information reveals Google's internal strategies, system designs, and business		
10			practices for operating and maintaining many of		
11			its important services, and falls within the		
			protected scope of the Protective Order entered		
12			in this action. See Dkt. 81 at 2-3. Public		
13			disclosure of such confidential and proprietary information could affect Google's competitive		
14			standing as competitors may alter their systems		
14			and practices relating to competing products. It		
15			may also place Google at an increased risk of		
16			cyber security threats, as third parties may seek to use the information to compromise Google's		
			internal projects, features, and practices relating		
17			to competing products.		
18	GOOG-BRWN-	GRANTED as to	The information requested to be sealed contains		
10	00048967.C (Dkt. 360-18)	redacted portions at:	Google's highly confidential and proprietary information regarding encryption of Google's		
19	300-10)	Page 33	produced document, that Google maintains as		
20			confidential in the ordinary course of its		
$_{21}$			business and is not generally known to the		
			public or Google's competitors. Such confidential and proprietary information reveals		
22			Google's internal strategies, system designs,		
23			and business practices for operating and		
24			maintaining many of its important services, and		
			falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt.		
25			81 at 2-3. Public disclosure of such confidential		
26			and proprietary information may place Google		
			at an increased risk of cyber security threats, as		
27			third parties may seek to use the information to compromise Google's internal documents		
28			subject to the Protective Order in this case.		
					

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1	GOOG-BRWN-	GRANTED as to	The information requested to be sealed contains			
2	00388293 (Dkt.	redacted portions at:	Google's highly confidential and proprietary			
	360-19)	pages 1, 3	information regarding Google's internal systems and operations, including details			
3		pages 1, 3	related to internal projects and discussions, that			
4			Google maintains as confidential in the			
7			ordinary course of its business and is not			
5			generally known to the public or Google's			
			competitors. Such confidential and proprietary			
6			information reveals Google's internal			
7			strategies, system designs, and business			
			practices for operating and maintaining many of			
8			its important services, and falls within the			
9			protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public			
			disclosure of such confidential and proprietary			
10			information could affect Google's competitive			
11			standing as competitors may alter their systems			
11			and practices relating to competing products. It			
12			may also place Google at an increased risk of			
13			cyber security threats, as third parties may seek			
13			to use the information to compromise Google's internal projects, features, and practices relating			
14			to competing products.			
15	GOOG-CABR-	GRANTED as to	The information requested to be sealed contains			
13	00501220 (Dkt.	redacted portions at:	Google's highly confidential and proprietary			
16	360-20)		information regarding highly sensitive features			
17		page 2-3, 5-6	of Google's internal systems and operations,			
1 /			including details related to internal projects and			
18			proprietary and potential features of its product, that Google maintains as confidential in the			
19			ordinary course of its business and is not			
19			generally known to the public or Google's			
20			competitors. Such confidential and proprietary			
21			information reveals Google's internal			
21			strategies, system designs, and business			
22			practices for operating and maintaining many of			
32			its important services, and falls within the protected scope of the Protective Order entered			
23			in this action. See Dkt. 81 at 2-3. Public			
24			disclosure of such confidential and proprietary			
25			information could affect Google's competitive			
25			standing as competitors may alter their systems			
26			and practices relating to competing products. It			
27			may also place Google at an increased risk of cyber security threats, as third parties may seek			
27			to use the information to compromise Google's			
28			internal projects, features, and practices relating			
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- ₁	1 to competing products.		to competing products
1	GOOG-CABR-	GRANTED as to	The information requested to be sealed contains
2	05269678 (Dkt.	redacted portions at:	Google's highly confidential and proprietary
3	360-21)		information regarding highly sensitive features
3	,	Pages 3, 9-13, 15, 18-20,	of Google's internal systems and operations,
4		22-25, 27, 30-32	including details related to internal projects and
ہے			proprietary and potential features of its product,
5			that Google maintains as confidential in the ordinary course of its business and is not
6			generally known to the public or Google's
7			competitors. Such confidential and proprietary
′∥			information reveals Google's internal
8			strategies, system designs, and business
			practices for operating and maintaining many of
9			its important services, and falls within the
10			protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public
$_{11}$			disclosure of such confidential and proprietary
11			information could affect Google's competitive
12			standing as competitors may alter their systems
13			and practices relating to competing products. It
			may also place Google at an increased risk of cyber security threats, as third parties may seek
14			to use the information to compromise Google's
15			internal projects, features, and practices relating
			to competing products.
16	24. Mardini	GRANTED as to	The information requested to be sealed contains
17	Transcript (Excerpt) (Dkt.	redacted portions at:	Google's highly confidential and proprietary information regarding Google's internal
10	360-24)	306:10	systems and operations, including details
18	,		related to internal projects, that Google
19			maintains as confidential in the ordinary course
20			of its business and is not generally known to the
20			public or Google's competitors. Such confidential and proprietary information reveals
21			Google's internal strategies, system designs,
22			and business practices for operating and
			maintaining many of its important services, and
23			falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt.
24			81 at 2-3. Public disclosure of such confidential
			and proprietary information could affect
25			Google's competitive standing as competitors
26			may alter their systems and practices relating to
27			competing products. It may also place Google at an increased risk of cyber security threats, as
~			third parties may seek to use the information to
28			compromise Google's internal projects and

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1				practices relating	g to competing products.
2		OPPER	ED		
3	SO ORDERED.		Ե Մ.		
4	D 1 ====				
5	DATED:				ABLE SUSAN VAN KEULEN
6					Agistrate Judge
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